

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

ARGELIA SOLITO,)	
)	
Plaintiff,)	
)	
v.)	CIVIL ACTION FILE
)	NO. 23A02118
SAM'S EAST INC., JOHN DOE 1-2,)	
ABC CORP., AND XYZ CORP.,)	
)	
)	
Defendants.)	

PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST INTERROGATORIES

COMES NOW, ARGELIA SOLITO, Plaintiff, and submits Responses to Defendant's First Interrogatories to Plaintiff.

GENERAL STATEMENT

Plaintiff does not waive any objection that may be appropriate to the use of any information provided in his Responses or to the admissibility, relevance, competency or materiality of any of the information to any issue in this case. Identifying or producing any document or supplying any information does not constitute an admission by Plaintiff that the document or information is relevant to the subject matter of this action. The Responses set forth below constitute the best information presently available to Plaintiff. However, Plaintiff reserves the right to amend, supplement or change any response made hereinafter if facts or documents subsequently are discovered which make amendment, supplementation or revision appropriate. Disclosure of any privileged or otherwise protected information, if any, is or was inadvertent and cannot be construed as a waiver of any such privilege.

30.

State in detail, to the best of your ability, all injuries you claim you received as a result of the incident giving rise to this lawsuit.

RESPONSE: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

31.

State whether you had any prior or subsequent injuries, diseases or difficulties in the areas of the body which you claim were injured in the occurrence, or to areas of your body involving your senses (sight, hearing, etc.) and/or balance, identify when said injuries, diseases or difficulties occurred, and give the names and addresses of all practitioners of the healing arts, including family doctors, who treated you for such injury, disease or difficulty.

RESPONSE: [REDACTED].

32.

- (a) State the names and addresses of all doctors, osteopaths, psychologists, physical therapists, chiropractors, and other practitioners of the healing arts who have treated you as a result of the incident that is the subject of this litigation, give the date of your last visit to each and indicate whether each has issued a written report regarding his or her treatment.
- (b) State the exact terms of and all billing, payment, or invoice agreements you and/or your attorney had or have with any of the practitioners identified in subsection (a).

RESPONSE:

Physician Name	Address	Dates of Treatment	Billing
Peachtree Spine and Sport Physicians	5555 Peachtree Dunwoody Road NE, Suite G65 Atlanta, GA 30342	08/09/2022-10/12/2022	\$36,653.80
Ortho Sport & Spine Physicians	5788 Roswell Rd NE Sandy Springs, GA 30328	Will be supplemented	Will be supplemented. Est. \$40,106.74
Northside Hospital	1000 Johnson Ferry Road NE Atlanta, GA 30342	08/05/2021	\$3,889.00
Northside Radiology	1000 Johnson Ferry Road NE Atlanta, GA 30342	08/05/2021	Will be supplemented
Northside Emergency Associates, PC	1000 Johnson Ferry Road NE Atlanta, GA 30342	08/05/2021	\$653.00

Plaintiff is hereby producing all medical records and medical bills in her possession or in the possession of her attorney. Plaintiff will supplement this response as more information becomes available.

RESPONSE: [REDACTED]

[REDACTED]

Respectfully submitted this July 25th, 2023,

**770-GOOD-LAW, LAW OFFICE
OF HUNG Q. NGUYEN &
ASSOCIATES, LLC**

/s/ Hung Q. Nguyen, Esq.
Hung Q. Nguyen, Esq.
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)	
)	
Defendants.)	

**PLAINTIFF ARGELIA SOLITO’S RESPONSES TO DEFENDANT SAM’S EAST INC
FIRST REQUEST FOR ADMISSIONS**

COMES NOW Plaintiff ARGELIA SOLITO (“Plaintiff”), Plaintiff in the above style civil action and submits the Responses to Defendant SAM’S EAST INC (“Defendant”) First Request for Admissions as follows:

RESPONSES TO FIRST REQUEST FOR ADMISSIONS

1

Please admit you will not seek, recover, or collect from Defendant Sam’s East, Inc. a sum in excess of \$75,000.00.

REPONSE: Denied.

2

Please admit you will seek to recover general and special damages from Defendant Sam’s East, Inc. a sum in excess of \$75,000.00.

REPONSE: Admitted.

3

Please admit that any portion of a verdict against Defendant Sam's East, Inc. that exceeds \$75,000.00 will be written down by the Court so that the judgment shall not exceed the sum of \$75,000.00.

REPONSE: Denied.

4

Please admit that Defendant Sam's East, Inc. shall not be ordered, adjudged, or called upon to pay to Plaintiff a sum in excess of \$75,000.

REPONSE: Denied.

5

Admit that Plaintiff is claiming past medical expenses in excess of \$40,000.00.

REPONSE: Admitted.

6

Admit that the incident described in Plaintiff's Complaint has not caused plaintiff to miss any time from work and has not caused any adverse consequences relative to plaintiff's employment.

REPONSE: Denied.

7

Admit that Plaintiff has lost no income as a result of the incident complained of within Plaintiff's Complaint.

REPONSE: Denied.

8

Admit that Plaintiff had prior problems, injuries, or treatment to Plaintiff's ankle(s) before the subject incident.

REPONSE: [REDACTED]

9

Admit that Plaintiff had prior problems, injuries, or treatment to Plaintiff's leg(s) before the subject incident.

REPONSE: [REDACTED]

10

Admit that Plaintiff had prior problems, injuries, or treatment to Plaintiff's thigh(s) before the subject incident.

RESPONSE: [REDACTED]

11

Admit that as a result of the incident complained of in Plaintiff's Complaint, Plaintiff did not sustain bodily injury which resulted in a permanent injury.

REPONSE: Denied.

12

Admit that Plaintiff was involved in accidents or incidents (including but not limited to all auto accidents, work accidents, slip and falls, trip and falls, sports injuries, home accidents, etc.), resulting in injury subsequent to the subject incident.

REPONSE: [REDACTED]

13

Admit that Plaintiff sought treatment for injuries sustained in accidents or incidents (including but not limited to all auto accidents, work accidents, slip and falls, trip and falls, sports injuries, home accidents, etc.) occurring subsequent to the subject incident.

REPONSE: [REDACTED]

Respectfully submitted this July 25, 2023,

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